Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Rulemaking under Part 97 of	)	
the Communications Act of 1934	)	RM-10740
as Amended to Establish Technical	)	
Standards for Certain Amateur	)	
Radio Telephony Transmissions	)	

To: The Commission

COMMENTS ON RULEMAKING PETITION

Submitted by:

Ashley Lane WA1ICN
135 Old Farms Road
West Simsbury, CT 06092

July 27, 2003

SUMMARY

The petitioners have submitted a rulemaking proposal based on their reasonable concerns that certain amateurs have created an interference problem by transmitting excessively wideband signals. These signals have been identified as so-called "hi-fi" or "extended bandwidth" single sideband (SSB)emissions that are normally transmitted in the 20 meter amateur phone band. The petitioners also claim the same problem of excessive bandwidth for double sideband band amplitude modulated (DSB-AM) emissions. They propose a rule change to part 97 to limit bandwidth to 2.8Khz for SSB and twice that of SSB to 5.6 kHz for DSB-AM.

The existing part 97 rules already cover the situation in question and there is no need for additional rulemaking. Specifically, Section 97.101(a)-(d), Emission standards, adequately covers bandwidth and spurious emissions, using clear and well-understood language. Section 97.101 is very specific that all amateurs have a responsibility to transmit signals that occupy a minimum of bandwidth, spurious and adjacent channel interference. Section 97.101(d) also gives precise limits for spurious emissions from transmitters built or marketed after April 15, 1977.

If the commission does find it necessary to impose rulemaking, they should be guided by 47 CFR 73.766, International Broadcast Stations, which limits the highest frequency transmitted to 5 kHz.

COMMENTS

The petitioners cite as evidence, Commission Enforcement Division

letters to certain amateurs who allegedly caused interference in the 20 meter band by transmitting excessively wideband SSB signals. They also state "To the petitioners' knowledge, AM operators have not tried to broaden their signals". While the evidence cited in the SSB case should stand by itself, my own experience would indicate an equally severe situation exists on the 75 meter AM band-segment here in the Northeast. As a daily listener to the 75 meter AM portion of the band for the past 3 years, there is a near state of mayhem during the early morning, late afternoon and evening hours when the band is most congested. Interference is routinely observed from a small group of amateurs who transmit AM signals with transmission bandwidths as wide as 12-14Khz(6-7kHz information bandwidth) usually at full legal transmitter power output. The interference from these stations is undoubtedly unintentional, nevertheless they routinely interfere with stations on an adjacent frequency channel.

Most of the problems seem to be caused by certain amateurs who use broadcast equipment such as equalizers and processors, along with modifications that allow a transmitter to pass a wider range of frequencies. These operators believe they have a right to transmit an unrestricted "hi-fi" or "broadcast quality" type emission that exceeds normal bandwidth requirement for speech. Even a cursory reading of 97.101(a) would these emissions are prohibited in all but the most uncongested band conditions.

RECOMMENDATION

If the commission does find it necessary to impose rulemaking, they should be guided by 47 CFR 73.766, International Broadcast Stations, which limits the highest frequency transmitted to 5 kHz. This corresponds to a maximum transmitted bandwidth of 5kHz for SSB and 10Khz for DSB-AM. 47 CFR 73.766 is the most appropriate section of the rules since it applies to shortwave stations that use frequencies with similar propagation characteristics as amateur bands. Unlike stations in the AM broadcast service, international broadcast stations can be assigned to adjacent frequency channels and the 5Khz limit is designed to eliminate interference in an adjacent 10Khz channel.

Respectfully submitted,

July 27, 2003